








**MERDEKA
BATTERY**
MATERIALS

PT MERDEKA BATTER MATERIALS Tbk

POLICY ABOLITION OF FORCED LABOR MBM-POL-IR-03-00

| PREPARED | CHECKED | | APPROVED | |
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|  |  |  |  |  |
| Chairul Reza Faisal | Yanthi Sepriana Siagian | Muhammad Regen Pohan | Titien Supeno | Devin Antonio |
| IR Superintendent | HR Compliance Supervisor | IR Manager | HR Director | President Director |
| 01 December 2023 | 01 December 2023 | 01 December 2023 | 01 December 2023 | 01 December 2023 |


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| PT MERDEKA BATTERY MATERIALS Tbk | | Document number | MBM-POL-IR-03-00 |
|  | ABOLITION OF FORCED LABOR | Effective date | 01 December 2023 |
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DOCUMENT CHANGE STATUS

| Revision Number | Division/Department | Reason of Change | Revision By | Revision Date |
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1. GENERAL

Policy regarding the Abolition of Forced Labor is developed, implemented, and managed for the benefit of PT Merdeka Battery Materials Tbk and its subsidiaries regarding the abolition and prohibition of forced labor practices in each Company's business activities.

Suppose, in the course of implementation, non-conformities are found that are not covered in this document and are considered important for one reason or another. In that case, the non-conformities will be further reviewed, and if they are to continue to be applied, they will be made into an addendum to this policy.

And suppose there is a difference in interpretation between this policy's Indonesian and English versions. In that case, the Indonesian version is the prevailing version. It will be used, and in the event of a request for discretion on implementing this policy, it must obtain prior approval from the President Director.

2. PURPOSE

The purpose of this policy is as a guideline to create a positive work environment by not engaging in forced labor practices by the Company or between superiors and subordinates.

3. SCOPE

This policy applies to all Employee at PT Merdeka Battery Materials Tbk and its subsidiaries.

4. RESPONSIBILITY

4.1 Top Management


The Top Management must approve and sign all quality management system documents, including Company Policies, Procedures, Work Instructions, Forms, and other documents.

4.2 Management Representative

The HR department must cooperate with other departments to prepare and revise all documents, including Company Policies, Procedures, Work Instructions, Forms, and other documents.

4.3 Department Head or Department Manager

The Department Head or Department Manager must review the relevant documented information to ensure that subordinate staff are aware of any changes or updates to the document. |

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5. GENERAL POLICY

5.1 Definition

1. The Company is PT Merdeka Battery Materials Tbk or its subsidiaries.
2. Employee are people who work at PT Merdeka Battery Materials Tbk or its subsidiaries.
3. Forced Labor is all work or services forced on an Employee with the threat of punishment if the Employee is unwilling to do it voluntarily.

5.2 General Standard

1. One form of human rights is the freedom to do a job voluntarily.
2. The Company will treat all Employee with respect and appropriately without any forced labor in carrying out every business activity of the Company based on the prevailing laws and regulations and international labor standards, specifically The International Labor Organization Declaration on Fundamental Principles and Rights at Work and The Core International Labor Conventions.
3. Performing illegal forced labor is categorized as a violation of the law and can be punished.

5.3 Abolition of Forced Labor

1. The Company is committed to abolishing and prohibiting forced labor.
2. The abolition and prohibition of forced labor are intended for work that is used as:
 - a. A tool of political suppression or education or as a punishment for understanding or expressing political or ideological views that are contrary to the prevailing political, social, and economic system;
 - b. How to mobilize and use labor for economic development;
 - c. Tool for disciplining Employee;
 - d. Penalties for participating in strikes;
 - e. How to discriminate based on race, social, nationality, or religion.

5.4 Forced Labor Exception

1. Some forms that are not categorized as forced labor are as follows:
 - a. Any work or service that must be performed under the mandatory military service law for jobs that are specifically military in nature;
 - b. Any work or service that is part of the ordinary duties of a citizen or a resident of a fully independent country;
 - c. Any work or service that is forced on any person as a result of a court decision provided that the work or service is carried out under the orders and

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supervision of government officials and the person is not hired or placed for use by private individuals, companies or associations;

- d. Any work or service that is forced in an emergency, namely in a state of war or disaster or a threatening catastrophe such as fire, flood, food shortage, earthquake, vicious plague or disease outbreak, attack by animals, insects or animals that damage plants and in general anything that can endanger the state of life or the safety of the whole or part of the population;
 - e. Small social tasks such as those carried out by members of the community directly and, therefore can be considered as ordinary obligations of citizens that are imposed on members of the community, provided that community members or their representatives have the right to be consulted about the needs of the work.
2. Forced labor carried out under exceptions cannot be used for income or the collection of proceeds used or traded by individuals and/or Companies.